

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NICOLE JENNINGS WADE,)	
JONATHAN D. GRUNBERG, and)	
G. TAYLOR WILSON)	
)	
Plaintiffs,)	
)	CIVIL ACTION
v.)	
)	
L. LIN WOOD,)	FILE NO. 1:22-CV-01073
)	
Defendant.)	
_____)	

NOTICE TO TAKE DEPOSITION

To: Andrew M. Beal, Esq.
Buckley Beal LLP
600 Peachtree Street, NE
Suite 3900
Atlanta, GA 30308

Please take notice that at 10:00 a.m. EST on Tuesday, November 1, 2022, at the State Bar of Georgia, 104 Marietta Street NW, Atlanta, GA 30303, counsel for the Defendant, will take the deposition of Plaintiff, NICOLE JENNINGS WADE, for all purposes under the Georgia Civil Practice Act, including discovery and cross-examination before a certified court reporter. The deposition noticed hereunder will be taken pursuant to O.C.G.A. § 9-11-26 and O.C.G.A. § 9-11-30. All parties are invited to attend and examine the witness.

This 29th day of August, 2022.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. CHRISTOPHER HARRISON
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the Northern District of Georgia, I hereby certify that this pleading has been prepared in compliance with Local Rule 5.1(C) using 14-point Times New Roman Font.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199
harrison@downeycleveland.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Andrew M. Beal, Esq.
Buckley Beal LLP
600 Peachtree Street, NE
Suite 3900
Atlanta, GA 30308

This 29th day of August, 2022.

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199